

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

Andre Tate, *et al.*,

Plaintiffs,

v.

City of Columbus, *et al.*,

Defendants.

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Case No. 2:23-cv-00492

Judge Michael H. Watson

DECLARATION OF JENNIFER KNIGHT IN SUPPORT

Pursuant to 28 U.S.C. §1746, the undersigned, Christopher Wiest, makes the following declaration, under penalty of perjury under the laws of the United States of America, that the facts contained herein are true and correct to the best of my knowledge and belief and that such facts are made based on my personal knowledge:

1. My name is Jennifer Knight, and I am one of the counsel for the Plaintiffs.
2. Until January 9, 2023, I was employed with the Columbus Police Department, solely in the capacity as a police officer, and never in the capacity as an attorney.
3. While I was deposed on a previous case in my official capacity, as were 16 other individuals, (See Case No. 2:18-cv-544 ECF Nos. 33, 34, 35), I Knight never testified during the trial, as my connection to the previous lawsuit was tenuous and my testimony unrelated to the question before the jury. I have never supervised nor worked directly with Ms. McFadden, I was not connected to the supervision of the Plaintiffs bringing this suit, nor was I present for any of the numerous discriminatory incidents that are detailed in the Plaintiffs' Complaint. I was not assigned to Internal

Affairs during the period when Ms. McFadden was being investigated, nor was I involved in the review or adjudication of the investigation involving Ms. McFadden's conduct. Again, I was never shown to be a principal figure to the allegations central to Ms. McFadden's previous claim, and the issue in which she prevailed in court recovering a total verdict of \$2.00 did not involve me.

4. The decision to reassign Ms. McFadden, during her Internal Affairs investigation for discrimination and harassment, was a decision that never involved me.
5. I am unaware of any testimony even remotely related to this matter that could not be obtained from other witnesses.

Pursuant to 28 U.S.C. §1746, I declare under penalties of perjury under the laws of the United States of America that the foregoing Declaration is true and correct to the best of my knowledge and belief and that such facts are made based on my personal knowledge.

Executed on May 16, 2023.


Jennifer Knight